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Vice President
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March 29, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

RE: In the Matter of New Service Reporting Requirements Under Price Cap Regulation
CC Docket No. 92-275

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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New Service Reporting Requirements

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CC Docket No. 92-275

Under Price Cap Regulation

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COMMENTS OF THE

consistently incorrect, and if so, take appropriate action on future new services demand forecasts. Additionally, the Commission believes the report is useful because isolation of operating results on a new service by new service basis should help determine whether the incentives price cap regulation was intended to create are in fact providing new services that customers want.

United supports the Commission's proposed change to annual reporting. As the Commission notes, the policy goals outlined above can be just as well served by annual filings as by quarterly filings. In fact, United believes that annual reporting may better serve the Commission's goals because, as the Commission itself points out: "since the initial forecasts are for an annual period, it is more consistent to require monitoring on an annual basis."²

Additionally, United agrees with the Commission that annual reporting will produce savings in time and resources for the Commission and carriers. Even though these savings may be "slight," United believes they justify the change in reporting practices, especially because, as pointed out above, the Commission's other policy goals will be met.

United also supports the Commission's proposal to terminate the reporting requirement for a particular new service after the second annual report following the inclusion of the new

² NPRM at para. 4.

service in price cap indexes. This proposal will provide the Commission and customers with three annual reports on a particular new service. Three reports should be more than adequate to meet the Commissions goals in this regard.

Respectfully submitted,

UNITED AND CENTRAL TELEPHONE
COMPANIES

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Their Attorneys

March 29, 1993

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 29th day of March, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of the United Telephone Companies" in CC Docket No. 92-275, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

ITS *
1919 M Street, N.W.
Room 246
Washington, D.C. 20554

Tariff Division (2) *
Federal Communications Commission
1919 M Street, N.W.
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Melinda L. Mills